

Lexi J. Hazam (SBN 224457)
lhazam@lchb.com
LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-100

Christopher A. Seeger (pro hac vice)
cseeger@seegerweiss.com
SEEGER WEISS, LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
Facsimile: (973) 679-8656

Previn Warren (pro hac vice)
pwarren@motleyrice.com
MOTLEY RICE LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: (202) 386-9610
Facsimile: (202) 232-5513

Plaintiffs' Co-Lead Counsel

Jennie Lee Anderson (SBN 203586)
jennie@andrusanderson.com
ANDRUS ANDERSON LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: (415) 986-1400
Facsimile: (415) 986-1474

Plaintiffs' Liaison Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:
Brittany Doffing, 4:22-cv-05892;
Malinda Harris, 4:22-cv-06085;

**SUPPLEMENTAL DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT
OF PLAINTIFFS' CONSOLIDATED *EX
PARTE* APPLICATION FOR
APPOINTMENT OF GUARDIANS *AD
LITEM***

1 *Ayla Tanton*, 4:22-cv-06545;
2 *Megan Waddell*., 4:22-cv-05888;
3 *Virginia Roth*, 4:22-cv-05884;
4 *Cecelia Tesch*, 4:22-cv-06167;
5 *Apriel Dorsey*, 4:22-cv-06451;
6 *Damian Johnson (and as next of friend to*
7 *minors K.L.J., J.A.J., and K.A.J.)*, 4:22-cv-
8 06418;
9 *E.W.*, 4:22-cv-04528;
10 *M.C.*, 4:22-cv-04529;
11 *T.K.*, 4:22-cv-04588;
12 *T.R.*, 4:22-cv-04712;
13 *C.C.*, 4:22-cv-04709;
14 *J.H. (and as next of friend to minors N.R.*
15 *and A.M.)*, 4:22-cv-04710;
16 *Shaw Jamerson*, 4:22-cv-06384;
17 *L.A.T. (and as next of friend to minors P.T.*
18 *and L.T.)*, 4:22-cv-04937;
19 *S.R.*, 4:22-cv-06455;
20 *Andrea Harrison*, 4:22-cv-06452;
21 *Bethany Odems*, 4:22-cv-06440;
22 *Sabrina Huff-Young*, 4:22-cv-06430;
23 *Luvonia Brown*, 4:22-cv-06668;
24 *Tabitha Quinones*, 4:22-cv-06431;
25 *Shanetta Kimber (and as next friend to minor*
26 *D.K.)*, 4:22-cv-06434;
27 *Mandy S. Westwood*, 4:22-cv-06461;
28

1 *Robert Turgeon*, 4:22-cv-06616;
2 *Angela Canche*, 4:22-cv-06449;
3 *Bernard Cerone*, 4:22-cv-06417;
4 *Jennifer Koutsouftikis*, 4:22-cv-06643;
5 *T.S.*, 4:22-cv-06454;
6 *Chad Smith*, 4:22-cv-06421;
7 *Stoudemire (on behalf of De'John*
8 *Davidson)*, 4:22-cv-06495;
9 *Stoudemire (on behalf of Ja'Taasha*
10 *Davidson)*, 4:22-cv-05987;
11 *Tiffany Woods*, 4:22-cv-6591;
12 *V.P.*, 4:22-cv-06617;
13 *J.O.*, 4:22-cv-05546;
14 *Rossana Agosta*, 4:22-cv-05565;
15 *M.F., B.F., A.F.*, 4:22-cv-05573;
16 *Nicholas Calvoni*, 4:22-cv-05873;
17 *Dayna Page*, 4:22-cv-06124;
18 *Sarie Neave*, 4:22-cv-06126;
19 *Julie Kosiorek*, 4:22-cv-06142;
20 *Zakey Amacker*, 4:22-cv-06150;
21 *Tracy Hunt*, 4:22-cv-06155;
22 *Tamesha Hicks*, 4:22-cv-06162;
23 *D.D., G.D.*, 4:22-cv-06190;
24 *Amanda Duke*, 4:22-cv-06200;
25 *Danielle Cohen*, 4:22-cv-06207;
26 *Kenisha Day*, 4:22-cv-06215;
27 *I.A.*, 4:22-cv-06252;
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Margit LaBlue, 4:22-cv-06256;
Khymberly Levin, 4:22-cv-06263;
Christian Brooks, 4:22-cv-06308;
Michelle Wheeldon, 4:22-cv-06306;
Jessica Bright, 4:22-cv-06318;
Rachelle Capka, 4:22-cv-06583;
Lawanda Simpson, 4:22-cv-06587;
Jeffrey Wombles, 4:22-cv-06685;
Melanie Clarke-Penella, 4:22-cv-06692;
Lorine Hawthorne, 4:22-cv-06751;
Chris J. Czubakowski, 4:22-cv-06989;
C.U., 4:22-cv-07347;
N.W., 4:22-cv-08937;
David Hemmer, 4:23-cv-00055;
C.N., 4:22-cv-04283;
Star Wishkin, 4:22-cv-06459;
Donna Copelton, 4:22-cv-06165;
Diane Williams, 4:22-cv-05886;
J.A., K.L., and A.L., 4:23-cv-00515;
G.W., 4:23-cv-00545;
Elizabeth Mullen, 4:23-cv- 00600;
A.C., 4:23-cv-00646;
D.D., J.D., 4:22-cv-06205;
Jessica Guerrero, 4:22-cv-05894;
Stephanie Carter, 4:22-cv-05986;
Kelli Cahoon, 4:22-cv-06117;
Kim Isaacs, 4:22-cv-05885;

1 *Edyta Lee*, 4:22-cv-06426;
 2 *Shanetta Kimber (I)*, 4:22-cv-06498;
 3 *Debra Hudson*, 4:22-cv-06296;
 4 *Veronica Hicks*, 4:22-cv-06627;
 5 *Donavette Ely*, 4:22-cv-06067
 6

7 I, Jennie Lee Anderson, do hereby declare and state as follows:

8 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
 9 to practice before the courts of the State of California and in the Northern District of California. I
 10 am the Court-appointed Liaison Counsel for Plaintiffs in *In re Social Media Adolescent*
 11 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of
 12 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
 13 make this declaration of my own personal knowledge and, if called as a witness, I could and
 14 would testify competently to the matters stated below.

15 2. I make this declaration in support of Plaintiffs' Consolidated *Ex Parte*
 16 Application for Appointment of Guardian *Ad Litem* (ECF 149).

17 3. Pursuant to the Court's Order Re: Appointment of Guardians *Ad Litem* (ECF.
 18 No. 188), I, along with my staff working under my direct supervision, have reviewed each of the
 19 *Ex Parte* Applications attached as Exhibits 1 to 75 to the Declaration of Jennie Lee Anderson In
 20 Support of Plaintiffs' Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 21 ("Anderson Declaration") (ECF No. 149-1) for accuracy and completeness, and to identify any
 22 Applications where the minor has reached the age of majority or where the case has been
 23 dismissed. Accordingly, Plaintiffs submit the following ***Revised Exhibits*** (using the same
 24 original Exhibit numbers identified in in the previously filed Anderson Declaration (*see* ECF Nos.
 25 149; 149-1)).

26 a. Attached hereto as **Revised Exhibit 1** is a true and correct copy of the *Ex Parte*
 27 Application for Appointment of Guardian *Ad Litem* I received for the case
 28

Doffing v. Meta Platforms, Inc., et al., 4:22-cv-05892.

- b. Attached hereto at **Revised Exhibit 3** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Tanton v. Meta Platforms, Inc., et al.*, 4:22-cv-06545.
- c. Attached hereto at **Revised Exhibit 4** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Waddell v. Meta Platforms, Inc., et al.*, 4:22-cv-05888.
- d. Attached hereto at **Revised Exhibit 8** is a true and correct copy of the first *Ex Parte* Application of Guardian *Ad Litem* I received for the case *Johnson (and as next of friend to minor K.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-06418.
- e. Attached hereto as **Revised Exhibit 9** is a true and correct copy of the second *Ex Parte* Application of Guardian *Ad Litem* I received for the case *Johnson (and of next of friend to minor J.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-06418.
- f. Attached hereto at **Revised Exhibit 10** is a true and correct copy of the third *Ex Parte* Application of Guardian *Ad Litem* I received for the case *Johnson (and to next of friend to minor K.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-06418.
- g. Attached hereto at **Revised Exhibit 13** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *T.K. v. Meta Platforms, Inc., et al.*, 4:22-cv-04588.
- h. Attached hereto at **Revised Exhibit 15** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *C.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04709.
- i. Attached hereto as **Revised Exhibit 18** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Jamerson v. Meta Platforms, Inc., et al.*, 4:22-cv-06384.
- j. Attached hereto at **Revised Exhibit 36** is a true and correct copy of the *Ex*

1 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 2 case *Woods v. Meta Platforms, Inc., et al et al.*, 4:22-cv-06591.

3 k. Attached hereto at **Revised Exhibit 38** is a true and correct copy of the *Ex*
 4 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 5 case *J.O. v. Meta Platforms, Inc., et al.*, 4:22-cv-05546.

6 l. Attached hereto at **Revised Exhibit 39** is a true and correct copy of the *Ex*
 7 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 8 case *Agosta v. Meta Platforms, Inc., et al.*, 4:22-cv-05565.

9 m. Attached hereto at **Revised Exhibit 40** is a true and correct copy of the *Ex*
 10 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 11 case *M.F., B.F., A.F. v. Meta Platforms, Inc.*, 4:22-cv-05573.

12 n. Attached hereto at **Revised Exhibit 41** is a true and correct copy of the *Ex*
 13 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 14 case *Calvoni v. Meta Platforms, Inc., et al.*, 4:22-cv-05873.

15 o. Attached hereto at **Revised Exhibit 45** is a true and correct copy of the *Ex*
 16 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 17 case *Amacker v. Meta Platforms, Inc., et al.*, 4:22-cv-06150.

18 p. Attached hereto at **Revised Exhibit 47** is a true and correct copy of the *Ex*
 19 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 20 case *Hicks (Tameshia) v. Meta Platforms, Inc., et al.*, 4:22-cv-06162.

21 q. Attached hereto at **Revised Exhibit 54** is a true and correct copy of the *Ex*
 22 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 23 case *Levin v. Meta Platforms, Inc., et al.*, 4:22-cv-06263.

24 r. Attached hereto at **Revised Exhibit 56** is a true and correct copy of the *Ex*
 25 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the
 26 case *Wheeldon v. Meta Platforms, Inc., et al.*, 4:22-cv-06306.

27 s. Attached hereto at **Revised Exhibit 60** is a true and correct copy of the *Ex*
 28 *Parte* Application for Appointment of Guardian *Ad Litem* I received for the

case *Wombles v. Meta Platforms, Inc., et al.*, 4:22-cv-06685.

t. Attached hereto at **Revised Exhibit 61** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case *Clarke-Penella v. Meta Platforms, Inc., et al.*, 4:22-cv-06692.

u. Attached hereto at **Revised Exhibit 67** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for the case, *Williams v. Meta Platforms, Inc., et al.*, 4:22-cv-05886.

v. Attached hereto at **Revised Exhibit 68** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for *Copelton v. Meta Platforms, Inc., et al.*, 4:22-cv-06165.

w. Attached hereto at **Revised Exhibit 70** is a true and correct copy of the *Ex Parte* Application for Appointment of Guardian *Ad Litem* I received for *G.W. v. Snap, Inc.*, 4:23-cv-00545.

4. Each application has been made by the minor's parent and/or legal guardian.

Further, each of the *Ex Parte* Applications are consistent with Attachment A to this Court's Order Regarding Appointment of Guardian *Ad Litem* (ECF No. 122), and include (1) the applicant's name and contact information (including address, email, and telephone number); (2) the name, case number, state of domicile (and its minimum age of capacity); (3) a statement that the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a statement affirming that the applicant is fully competent and qualified to understand and protect the rights of the minor plaintiff and has no interests adverse to the interests of that person. Each Application also includes the minor's full name.

5. I have been informed by counsel for Plaintiffs in the following cases that the named Plaintiffs were minors at the time their cases were filed, but they have subsequently reached the minimum age of capacity to sue in the state of their domicile such that they no longer require that their action be brought by a next friend or guardian *ad litem*.

- *Guerrero v. Meta Platforms, Inc., et al.*, 4:22-cv-05894;
- *Carter v. Meta Platforms, Inc., et al.*, 4:22-cv-05986;

- *Cahoone v. Meta Platforms, Inc., et al.*, 4:22-cv-06117;
- *Isaacs v. Meta Platforms, Inc., et al.*, 4:22-cv-05885;
- *Lee v. Meta Platforms, Inc., et al.*, 4:22-cv-06426;
- *Kimber v. Meta Platforms, Inc., et al.*, 4:22-cv-06498;
- *Hudson v. Meta Platforms, Inc., et al.*, 4:22-cv-06296;
- *Hicks (Veronica) v. Meta Platforms, Inc., et al.*, 4:22-cv-06627;
- *C.N. v. Meta Platforms, Inc.*, 4:22-cv-04283;
- *Ely v. Meta Platforms, Inc., et al.*, 4:22-cv-06067;
- *Mullen v. Meta Platforms, Inc., et al.*, 4:23-cv-00600; and
- *T.R. v. Meta Platforms, Inc., et al.*, 4:22-cv-04712

6. Furthermore, since the filing of Plaintiffs' Consolidated *Ex Parte* Application, the following cases have been dismissed:

- *Harris v. Meta Platforms, Inc., et al.*, 4:22-cv-06085 (Exhibit 2);
- *Roth v. Meta Platforms, Inc., et al.*, 4:22-cv-05884 (Exhibit 5);
- *Odems v. Meta Platforms, Inc., et al.*, 4:22-cv-06440 (Exhibit 22);
- *Huff-Young v. Meta Platforms, Inc., et al.*, 4:22-cv-06430 (Exhibit 23);
- *Brown v. Meta Platforms, Inc., et al.*, 4:22-cv-06668 (Exhibit 24);
- *Quinones v. Meta Platforms, Inc., et al.*, 4:22-cv-06431 (Exhibit 25);
- *Kimber v. Meta Platforms, Inc., et al.*, 4:22-cv-06434 (Exhibit 26);
- *Smith (Chad) v. Meta Platforms, Inc., et al.*, 4:22-cv-06421 (Exhibit 33);
- *Hunt v. Meta Platforms, Inc., et al.*, 4:22-cv-6155 (Exhibit 46);
- *Day v. Meta Platforms, Inc., et al.*, 4:22-cv-06215 (Exhibit 51);
- *Brooks v. Meta Platforms, Inc., et al.*, 4:22-cv-06308 (Exhibit 55);
- *Bright v. Meta Platforms, Inc., et al.*, 4:22-cv-06318 (Exhibit 57);
- *Capka v. Meta Platforms, Inc., et al.*, 4:22-cv-06583 (Exhibit 58); and
- *Simpson v. Meta Platforms, Inc., et al.*, 4:22-cv-06587 (Exhibit 59).

7. To the best of my knowledge, all minor Plaintiffs whose cases were transferred or assigned to this Multidistrict Litigation on or before December 27, 2022, have submitted an

1 Application for Appointment of Guardian *Ad Litem*, true and correct copies of which are attached
2 hereto.

3 I declare under penalty of perjury pursuant to the laws of the United States of America that
4 the foregoing is true and correct.

5
6 Dated: March 24, 2023

Respectfully submitted,

7 /s/Jennie Lee Anderson
8 Jennie Lee Anderson

9 *Plaintiffs' Liaison Counsel*

10 ANDRUS ANDERSON LLP
11 155 Montgomery Street, Suite 900
12 San Francisco, CA 94104
13 Telephone: (415) 986-1400
14 Facsimile: (415) 986-1474
15 jennie@andrusanderson.com
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